Amdt. dated July 30, 2003

Reply to Office Action of March 31, 2003

REMARKS/ARGUMENTS

The above Amendments and these Remarks are in reply to the Office Action mailed March 31, 2003.

In the Office Action, the Examiner rejected claims 1-4, 6-12, 14 and 16-18 and objected to claims 5,

13, and 15. Reconsideration of the rejections is requested.

The figures are objected to under 37 CFR 1.83 (a) for failing to show every feature of the invention

described in the claims. Specifically, the Examiner objects to the drawings with respect to the following

features of particular dependent claims: the polarizing filter of claim 4, the variations of intensity and

polarization of claims 12 and 13, and the varying human body sections of claims 15-18. With regards to this

objection, the Examiner is directed towards the second half of 37 CFR 1.83 (a) which states "However.

conventional features disclosed in the description and claims, where there detailed illustration is not necessary

for a proper understanding of the invention, should be illustrated in the drawing in the form of a graphical

drawing symbol or a labeled rectangular box". Figures 1, 3, and 5 illustrate light sources 5, 10 optionally

having varying intensities and polarizations (p.3 l. 26) or a polarizing filter (p. 6 ll. 9-10). Under 37 CFR 1.83

applicants are directed to provide basic graphical illustrations of the light sources, rather than detailed

illustrations. With regards to claims 15-18, which are directed towards the detection of particular parts of a

the target, Figure 5 illustrates the detection of a portion 80 of the target 20. It is thus submitted, that the figures

are acceptable under 37 CFR 1.83 (a).

Claims 15-18 were objected to for lacking proper antecedent basis for "person". With respect to

claims 15-17, these claims, either originally, or through dependencies, recite "a person". Claim 18 has been

amended to depend from claim 16, thus providing antecedent basis.

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Attorney Docket No.: FXPL-01012US0 MCF/BTW

btw/fxpl/1012US0 response to office action.wpd

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Claims 1-4, 6-12, 14, and 16-18 are rejected under 35 U.S.C. 102(a) as being anticipated by Leibe

et al. Applicants respectfully traverse the rejection. The independent claims disclose:

A system for determining the location of a target, comprising:

a plurality of light sources;

a projection surface with at least two sides, oriented in such a way that the light

sources can illuminate one side of the projection surface;

a target located entirely between the light sources and one side of the

projection surface, and away from the projection surface; and

an imaging device located on the side of the projection surface opposite the

target, the imaging device being configured to detect a shadow from the target on the

projection surface caused by individual ones of the light sources.

Leibe discloses a system for imaging objects upon a workbench, where multiple near-infrared light sources

are arranged lateral to desk. A camera with a filter that blocks out all visible light is also located near the

light sources. Objects placed upon the table reflect infrared light from the infrared sources through the

translucent table surface back towards the imaging device.

Leibe does not disclose a target located "away from the light source". Rather, as indicated in the

abstract "objects are recognized and tracked when placed upon the display surface". This limitation is

not incidental. Since the system of Leibe depends upon light sources which transmit infrared light through

the table, which is then reflected back through the table towards the imaging device, only objects located

near the surface of the table will be imaged correctly.

Additionally, Leibe does not disclose "an imaging device located on the side of the projection

surface opposite the target, the imaging device being configured to detect a shadow from the target on the

projection surface caused by individual ones of the light sources". The imaging device in Leibe is not

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located on the side of the desk opposite the target. Rather it sits to the side, and receives reflected IR

from a mirror located under the desk (see figure 3). Thus, Applicants submit that Leibe does not

disclose all of the features of the claimed invention and request that he withdraw his rejection.

The references cited by the Examiner but not relied upon have been reviewed, but are not believed to render

the claims unpatentable, either singly or in combination.

In light of the above, it is respectfully submitted that all of the claims now pending in the subject patent

application should be allowable, and a Notice of Allowance is requested. The Examiner is respectfully

requested to telephone the undersigned if he can assist in any way in expediting issuance of a patent.

Enclosed is a PETITION FOR EXTENSION OF TIME UNDER 37 C.F.R. § 1.136 for extending the time

to respond by one month. The Commissioner is authorized to charge any underpayment or credit any

overpayment to Deposit Account No. 06-1325 for any matter in connection with this response, including any

fee for extension of time, which may be required.

July 36,2003

Respectfully submitted,

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Appendix to the Drawings:

Enclosed are three sheets of formal drawings for the above-identified patent application as required

by the Office Action dated March 31, 2003.

Subject to the Examiner's approval, please substitute the enclosed drawings for the drawings

previously submitted.

Attachment:

3 Replacement Sheets

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